To: Gardner, Allison[Gardner.Allison@epa.gov]

From: Henry, Jeannar

Sent: Thur 6/20/2013 1:56:23 PM Subject: RE: RCRA Question

Hi Allison,

The notes in the database state "Received Annual Self-Certification of Compliance form and annual fee" for each year a NRR was conducted (2011, 2012 & 2013). So, no real evaluation of the facility's compliance. Also, the EPA ID No. is DCR000000208.

Hope this is helpful J

Thanks!!

Jeanna R. Henry, Environmental Scientist

Land and Chemicals Division (3LC30)

EPA Region 3

1650 Arch Street

Philadelphia, PA 19103

T: (215) 814-2820

F: (215) 814-3113

From: Gardner, Allison

Sent: Thursday, June 20, 2013 9:28 AM

To: Henry, Jeannar

Subject: RE: RCRA Question

Sorry – that was what was in Envirofacts. First Street, SW, Washington, DC 20024.	The facility is Super Salvage and is located at 1711 Thanks for taking the time to do this!

From: Henry, Jeannar

Sent: Thursday, June 20, 2013 9:21 AM To: Gardner, Allison; Coe, Mary Subject: RE: RCRA Question

Hi Allison,

Allison

What is the facility name and location. EPA ID Nos. are 9-numerical digits.

Thanks!!

Jeanna R. Henry, Environmental Scientist

Land and Chemicals Division (3LC30)

EPA Region 3

1650 Arch Street

Philadelphia, PA 19103

T: (215) 814-2820

F: (215) 814-3113

From: Gardner, Allison

Sent: Thursday, June 20, 2013 9:16 AM

To: Henry, Jeannar; Coe, Mary Subject: RE: RCRA Question

Thanks! The EPA facility ID is 110002503693.

From: Henry, Jeannar

Sent: Thursday, June 20, 2013 9:07 AM To: Coe, Mary; Gardner, Allison Subject: RE: RCRA Question

Good Morning Ladies,

According to the definition for RCRA Info – a "Non-financial Record Review" is "an evaluation conducted in the Agency office involving a detailed review of non-financial records." As you can see this is pretty broad, so it could be for a number of things. I would suggest contacting the state to find out more detail.

I could also look in RCRA Info for any "notes" that may be available if you'd like. Just provide me with the EPA ID No.

Thanks!!

Jeanna R. Henry, Environmental Scientist

Land and Chemicals Division (3LC30)

EPA Region 3

1650 Arch Street

Philadelphia, PA 19103

T: (215) 814-2820

F: (215) 814-3113

From: Coe, Mary

Sent: Thursday, June 20, 2013 8:59 AM

To: Gardner, Allison **Cc:** Henry, Jeannar

Subject: RE: RCRA Question

I'm assuming they reviewed "physical plant" stuff (equipment, units) and perhaps documents like manifests and inspection reports that are required to be kept on file, but did not examine or analyze financial assurance records documenting adequate coverage (as required by the regs).

Jeanna – does that sound right?

From: Gardner, Allison

Sent: Thursday, June 20, 2013 8:46 AM

To: Coe, Mary

Subject: RCRA Question

Mary,

I'm looking at a facility where we might have a multi-media case. ICIS indicates that the state performed a "non-financial records review" in February. And they have done the same thing for the last 2 years. Can you tell me what this kind of review involves? Thanks!

Allison

Allison F. Gardner Senior Assistant Regional Counsel U.S. Environmental Protection Agency, Region III 1650 Arch Street (3RC60) Philadelphia, PA 19103 (215) 814-2631

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